

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF UNIVERSITY
PROFESSORS, ET AL.,

Plaintiffs,

v.

MARCO RUBIO, ET AL.

Defendants.

Case No. 1:25-cv-10685 (WGY)

STIPULATION AND ~~PROPOSED~~ ORDER

WHEREAS, Plaintiffs American Association of University Professors, American Association of University Professors-Harvard Faculty Chapter, American Association of University Professors at New York University, Rutgers American Association of University Professors-American Federation of Teachers, and Middle East Studies Association (“Plaintiffs”), by and through their undersigned counsel, and Defendants Marco Rubio, Kristi Noem, Todd Lyons, and Donald J. Trump (“Defendants”) have stipulated and agreed that all statements made by government officials and agents, and quotes attributed to them, in the following documents are authenticated pursuant to Federal Rule of Evidence 901:¹

1. Secretary of State Marco Rubio’s March 6, 2025 post on X (available at <https://perma.cc/KD9R-BNV3>);
2. Department of Homeland Security’s March 9, 2025 post on X (available at <https://perma.cc/3NNQ-235L>);

¹ Defendants do not waive hearsay objections to any statements other than those by government officials and agents stipulated to in this document.

3. Secretary of State Marco Rubio's March 9, 2025 post on X (available at <https://perma.cc/Q7EH-M4LW>);
4. President Donald J. Trump's March 10, 2025 post on Truth Social (available at <https://perma.cc/Z5PU-7MZT>);
5. White House Press Secretary Karoline Leavitt's March 11, 2025 Press Briefing transcript (available at <https://perma.cc/XAJ6-N2CD>);
6. Secretary of State Marco Rubio's March 12, 2025 remarks to the press in Shannon, Ireland (available at <https://www.state.gov/secretary-of-state-marco-rubio-remarks-to-press/>);
7. Deputy Secretary of Homeland Security Tony Edgar's March 13, 2025 interview with NPR (available at <https://perma.cc/Q45C-6B9A>);
8. Vice President J.D. Vance's March 13, 2025 Fox New Interview Transcript (available at [Dkt. No. 14-18](#));
9. The March 14, 2025 Department of Homeland Security Press Release (available at <https://perma.cc/7YAG-38XF>);
10. Secretary of State Mark Rubio's March 16, 2025 interview on CBS's Face the Nation (available at <https://perma.cc/DV8P-2CWZ>);
11. Department of Homeland Security Assistant Secretary for Public Affairs Tricia McLaughlin's March 19, 2025 post on X (available at <https://perma.cc/JE82-K8CM>);
12. Secretary of State Marco Rubio's March 27, 2025 remarks during a Joint Press Availability with Guyanese President Irfaan Ali (available at <https://perma.cc/8LC9-S86R>);
13. Secretary of State Marco Rubio's March 28, 2025 remarks to the press (available at <https://perma.cc/5YPB-GBGX>);

14. Secretary of State Marco Rubio's April 8, 2025 interview on Triggered with Don Jr. (available at <https://perma.cc/6RD7-S8DN>);

15. The April 9, 2025 Department of Homeland Security Press Release (available at <https://perma.cc/ZSM5-X5GE>);

16. White House Deputy Chief of Staff Stephen Miller's April 14, 2025 interview with Fox News (available at <https://bsky.app/profile/atrupar.com/post/3lmroj5yzz723>);

17. Secretary of State Marco Rubio's April 17, 2025 interview on the Ben Shapiro Show (available at <https://perma.cc/K92W-A4XN>);

18. Department of Homeland Security Assistant Secretary for Public Affairs Tricia McLaughlin's April 30, 2025 post on X (available at <https://perma.cc/T6JE-3H9Y>);

19. The May 7, 2025 NPR article quoting Department of Homeland Security Assistant Secretary for Public Affairs Tricia McLaughlin (available at <https://perma.cc/U9JK-G75Z>);

20. Secretary of State Marco Rubio's May 7, 2025 post on X (available at <https://perma.cc/RNB6-YUUH>);

21. Department of Homeland Security Assistant Secretary for Public Affairs Tricia McLaughlin's May 8, 2025 post on X (available at <https://perma.cc/TA4V-8HDP>);

22. The January 30, 2025 White House Fact Sheet Titled "Fact Sheet: President Donald J. Trump Takes Forceful and Unprecedented Steps to Combat Anti-Semitism" (available at <https://www.whitehouse.gov/fact-sheets/2025/01/fact-sheet-president-donald-j-trump-takes-forceful-and-unprecedented-steps-to-combat-anti-semitism/>).

Dated: New York, New York
June 9, 2025



Michael Tremonte
Noam Biale
Alexandra Conlon
Courtney Gans
90 Broad Street, 23rd Floor
New York, New York 10004
(212) 202-2603
mtremonte@shertremonte.com
nbiale@shertremonte.com

Ramya Krishnan
Carrie DeCell
Xiangnong Wang
Talya Nevins
Jackson Busch
Scott Wilkens
Alex Abdo
Jameel Jaffer
Knight First Amendment Institute
at Columbia University
475 Riverside Drive, Suite 302
New York, NY 10115
(646) 745-8500
ramya.krishnan@knightcolumbia.org

Ahilan T. Arulanantham
Professor from Practice
UCLA School of Law
385 Charles E. Young Dr. East
Los Angeles, CA 90095
(310) 825-1029
arulanantham@law.ucla.edu

Edwina Clarke, BBO 699702
130 Bishop Allen Drive
Cambridge, MA 02139
(617) 676-9423
edwina@zimmercitronclarke.com

Attorneys for Plaintiffs

YAAKOV M. ROTH
Acting Assistant Attorney General
DREW C. ENSIGN
Deputy Assistant Attorney General
LEAH B. FOLEY
United States Attorney
SHAWNA YEN
Assistant United States Attorney
District of Massachusetts

WILLIAM KANELLIS
Trial Attorney

ANTHONY NICASTRO
Acting Director

/s/ Ethan B. Kanter

ETHAN B. KANTER
Chief, National Security Unit
Office of Immigration Litigation
Civil Division, U.S. Department of Justice
P.O. 878, Ben Franklin Station
Washington, DC. 20044
(202) 616-9123
ethan.kanter@usdoj.gov

Attorneys for Defendants

SO ORDERED



Hon. William G. Young, U.S. District Judge